

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

In Re:

Case No. 10-06855 SEK

JUAN M DE LEON MORALES

Chapter 13

Debtor(s)

**ANSWER TO MOTION TO DISMISS
FILED BY CHAPTER 13 TRUSTEE**

TO THE HONORABLE COURT:

NOW COMES the debtor, through the undersigned attorney, and very respectfully alleges and prays:

1. That the Chapter 13 Trustee has filed a Motion to Dismiss stating that debtor failure to submit complete documents requested at the meeting of creditors (Dkt#12)
2. That debtor already filed amendments to the Schedule A to include widow usufruct and submitted documents to sustain value of the property. (Dkt# 13)
3. That debtor is submitting evidence of being current with the repayment plan. (See evidence attached)

WHEREFORE, it is respectfully requests this Honorable Court to take notice of the aforementioned, deny the trustee's motion requesting dismissal.

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY that a true and exact copy of the foregoing motion has been filed electronically with the Clerk of the Court using CM/ECF systems which will send notification of such to the Chapter 13 Trustee, and we sent copy of this document through regular mail to debtor (s) and all non CM/ECF participants interested parties to their addresses listed on the master address list.

In San Juan, Puerto Rico this 17 th day of September of 2010.

JPC LAW OFFICE

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By: /s/ Jose M Prieto Carballo, Esq.

NUM. 3980855
BENEFICIARIO ALEJANDRO OLIVERAS

FECHA 09/11/2010

CONCEPTO CHEQUE OFICIAL

IMPORTE \$ 500.00

Si este cheque oficial se pierde, es destruido o robado, usted o el tomador, deberá presentar una declaración de Cheque Oficial Perdido, Destruído o Robado. La Ley de Instrumentos Negociables y Transacciones Bancarias dispone que su reclamación será exigible dentro del período de la fecha del cheque. Antes dicho período de tiempo su reclamación no tendrá ningún efecto legal y el Banco podrá pagar el cheque.

